

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

|                                 |           |                |
|---------------------------------|-----------|----------------|
| COMMONWEALTH OF PENNSYLVANIA    | :         |                |
| DEPARTMENT OF ENVIRONMENTAL     | :         |                |
| PROTECTION,                     | :         |                |
|                                 | Plaintiff | :              |
| v.                              | :         | No. 02-CV-2888 |
|                                 | :         |                |
| CONCEPT SCIENCES, INC., ET. AL. | :         |                |
|                                 | :         |                |
|                                 | Defendant | :              |

***ANSWER OF LEHIGH REALTY ASSOCIATES III, JAMES H. REDINGTON,  
JOHN ADAMS AND ESTATE OF JACOB QUICK C/O JUDITH QUICK  
TO CO-DEFENDANTS' CROSS-CLAIMS***

Defendants, Lehigh Realty Associates III, James H. Redington, John Adams and Estate of Jacob Quick c/o Judith Quick (collectively, "Lehigh Realty Defendants"), through their attorneys, Deasey, Mahoney & Bender, Ltd., for their answer to the cross-claims of co-defendants Concept Sciences, Inc., Irl E. Ward, Jr. and Brian D. Heath, aver as follows:

1. The Lehigh Realty Defendants incorporate by reference their answers to paragraphs 1 through 120 of the complaint, as if such answers were set forth at length herein. To the extent a response to this paragraph is required, the allegations contained therein are denied.
2. This paragraph contains no allegations of fact to which any response is required. To the extent a response is deemed required, the Lehigh Realty Defendants incorporate by reference their answers to paragraphs 1 through 120 of the complaint as if such answers were set forth at length herein, as well as their affirmative defenses and cross-claims against co-defendants.
3. The allegations set forth in this paragraph set forth one or more conclusions of law